

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 20-CR-10100-ADB
	)	
JONATHAN NGUYEN	)	
_____	)	

ASSENTED-TO MOTION TO CONTINUE

NOW COMES the Defendant, Jonathan Nguyen, by and through counsel, and moves this Honorable Court to continue the Sentencing Hearing in this matter for a period of 30 days, as the Court's docket permits. In support of this, the Defendant as follows:

1. The Defendant is scheduled to appear before this Honorable Court (by video) for Sentencing on December 8, 2020, at 10:30 a.m.

2. On December 8, 2020, at 9:00 a.m., counsel for the Defendant is scheduled to appear in-person before the Hillsborough County Superior Court, Northern District, in Manchester, New Hampshire, for jury selection in the matter of State of New Hampshire v. McInnes. The defendant in McInnes is incarcerated.

3. AUSA Mackenzie Queenin has been contacted and assents to this Motion to Continue.

WHEREFORE, the Defendant prays for the following relief:

A. To continue the Sentencing Hearing for a period of 30 days, as the Court's docket permits; and

B. For such other relief the Court deems equitable and just.

Respectfully submitted,

Jonathan Nguyen  
By his attorneys,

WILSON, BUSH & KEEFE, P.C.

Dated: November 11, 2020

/s/ Charles J. Keefe  
Charles J. Keefe  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Assented-Motion to Continue was this day forwarded to Mackenzie Queenin, Esquire, Assistant U.S. Attorney, through the Electronic Case Filing System.

Dated: November 11, 2020

/s/ Charles J. Keefe  
Charles J. Keefe